

1 Paige Pembrook, SBN 305610
2 Hannah Stitt, SBN 309349
3 TECTONIC, LLP
4 3929 24th Street, #3
5 San Francisco, CA 94114
6 paige@tectoniclaw.com
7 628-203-8479

8 *Attorneys for Defendant,*
9 *Matthew Provins*

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

12 JOSHUA JORDAN,

13 Plaintiff,

14 v.

15 MATTHEW PROVINS,

16 Defendant.

No. 2:23 – cv- 00287 DJC CKD (PS)

**DECLARATION OF JORDAN APODACA
IN SUPPORT OF DEFENDANT’S
MOTION TO STRIKE THE COMPLAINT
UNDER CAL. CIV. PROC. CODE
SECTION 425.16**

Hearing

Date: June 7, 2023

Time: 10:00 AM

Dept: Courtroom 24, 8th Floor

Judge: Carolyn N. Delaney

Complaint Filed: February 16, 2023

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

1. I make this declaration in support of Defendant Matthew Provins’s Motion under California’s anti-SLAPP statute, Cal. Civ. Proc. Code section 425.16, to strike the Complaint filed by Plaintiff Joshua Jordan (“Jordan”). I have personal knowledge of all facts stated in this declaration, and if called to testify, I could and would testify competently thereto.

3. In 2021, I contracted with PreHired to help enroll prospective students into PreHired.

5. I would provide substantive testimony in this matter, but a Settlement and Release Agreement with PreHired and Jordan prevents me from offering testimony, absent a waiver of the non-disclosure provisions of the Agreement, or a court order allowing me to speak.

I declare under penalty of perjury that the foregoing is true and correct.

18
19
20
21
22
23
24
25
26
27
28